

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 MOHAMMED GISAN )  
 )  
 Defendant )  
 )  
 )  
 )  
 )  
 )

Crim. No. 12cr10097 APR -6 P 2:20

18 U.S.C. §1028(a)(7) U.S. DISTRICT COURT  
(Unlawful Transfer, Possession, or Use of  
a Means of Identification)

**INFORMATION**

The United States Attorney charges:

**BACKGROUND**

At all times relevant to this information:

1. MOHAMMED GISAN lived in Cambridge, Massachusetts.
2. GISAN was employed by a temporary staffing agency. From approximately October 10, 2010 to May 2, 2011, GISAN was assigned by the agency to work at the Newton offices of Upromise Investments, Inc. ("UII").
3. UII, a subsidiary of Sallie Mae, is the leading administrator of 529 College Savings plans. Gisan's assignment at UII was to provide transaction services on customer's 529 plan accounts.
4. During the course of his assignment at UII, GISAN had access to personal information about the 529 plan account holders, including names, dates of birth, social security numbers, and beneficiary information.
5. Although he was aware that he was not permitted to remove personal information about account holders from the offices of UII, GISAN repeatedly did so over the course of several

months.

6. On or about May 2, 2011 and May 3, 2011, following the termination of his assignment at UII, GISAN used the personal information he had previously obtained about 529 plan account holders to create Web Access for five accounts. GISAN also created false email accounts to associate with each of the Web Access profiles.

7. The balances in the five 529 plans targeted by GISAN ranged from \$38,023 to \$321,017, and totaled \$965,274.

8. GISAN intended to create online bank accounts in the name of each of the 529 plan account holders which he could control, then move the funds from the plans into these bank accounts to obtain the funds.

9. GISAN was prevented from obtaining the funds due to the security and loss prevention measures taken by Sallie Mae and notification by a victim.

**COUNT ONE THROUGH FIVE**  
**(Unlawful Transfer, Possession, or Use of a Means of Identification)**  
**18 U.S.C. § 1028(a)(7)**

10. The United States Attorney realleges and incorporates by reference paragraphs 1-9 of this Information and further charges that:

11. On or about the dates set forth below, in the District of Massachusetts, the defendant

**MOHAMMED GISAN**

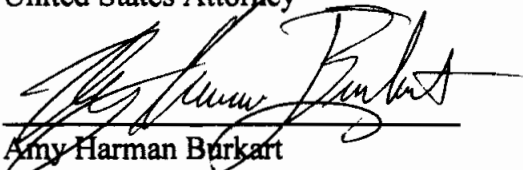
knowingly and with intent to defraud, transferred, possessed and used, in and affecting interstate commerce, without lawful authority, a means of identification of another person – to wit an individual's name, date of birth, and social security number – with the intent to commit, and aid and abet, unlawful activity that constitutes a violation of Federal law, to wit wire fraud (in violation of 18 U.S.C. § 1343), and law of the Commonwealth of Massachusetts, to wit grand larceny (in violation of Mass. Gen. Laws Ann. ch 266 § 30(11)):

<b>Count</b>	<b>Date (s)</b>	<b>Victim</b>	<b>Account Balance</b>
1	5/2/2011	R.D.	\$237,303.57
2	5/2/2011	H.B.	\$321,017.94
3	5/2/2011 and 5/3/2011	G.M.	\$95,544.85
4	5/2/2011 and 5/3/2011	R.V.	\$38,023.22
5	5/2/2011	A.R.	\$273,384.69

All in violation of 18 U.S.C. §1028(a)(7).

CARMEN M. ORTIZ  
United States Attorney

By:

  
Amy Harman Burkart  
Assistant U.S. Attorney

Dated: April 6, 2012